



May 23, 2011

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *Connect America Fund*, WC Docket No. 10-90; *High Cost Universal Service Support*, WC Docket No. 05-337; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45

Dear Ms. Dortch:

On May 20, 2011, Melissa Newman and Jeff Lanning on behalf of CenturyLink, and I on behalf of Frontier, met with Amy Bender, Ted Burmeister, Joe Cavender, Rebekah Goodheart, Patrick Halley, Carol Matthey and Doug Slotten of the Wireline Competition Bureau to discuss the above-captioned proceedings.

CenturyLink and Frontier emphasized the importance of IAS funding to both companies as a well-targeted support mechanism that has facilitated quality voice service and broadband deployment in rural America. In particular, IAS is one program that is mitigating the “rural/rural divide” and, as such, should not be phased out in a first part of a Commission program to fix the rural/rural divide. Accordingly, CenturyLink and Frontier expressed concerns about the short timeframe that the Commission has proposed for phasing out IAS.¹ As an alternative, CenturyLink and Frontier proposed to reconfigure the current IAS fund quickly to an interim fund for broadband infrastructure. Fund recipients would continue to receive support so long as the recipient was willing to certify that the money received from this fund would go towards broadband infrastructure. If a current IAS recipient declined to utilize funding in this manner then the funds would be removed from the recipient and included in the overall Connect America Fund. In this manner, the Commission would facilitate additional broadband deployment in rural America more quickly and effectively than through the *NPRM* proposal.

Please feel free to contact me with any further questions.

¹ *In re: Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up*, WC Dkt. Nos. 10-90, 07-135, 05-337, 03-109; GN Dkt. No. 09-51; CC Dkt. Nos. 01-92, 96-45, *Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking*, FCC 11-13 at ¶¶ 233-40 (rel. Feb. 9, 2011) (“*NPRM*”).

Sincerely,

/s/

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cc: Amy Bender
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Joe Cavender
Rebekah Goodheart
Patrick Halley
Carol Matthey
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